

1 Q And you'll notice at page 9 you're listed as  
2 Norman -- as, as secretary. Do you see that?

3 A Yes.

4 Q Were you secretary for Translator Television, Inc.?

5 A No.

6 Q Were you acting secretary for Translator Television,  
7 Inc.?

8 A I would have -- yes, that would have been the capac-  
9 ity.

10 Q And was that a self-imposed title?

11 A I didn't impose it upon myself but that's what I was  
12 in fact.

13 JUDGE CHACHKIN: You weren't elected to that.

14 MR. JUGGERT: I wasn't elected or, or -- yeah, I  
15 wasn't elected in that position.

16 BY MR. COHEN:

17 Q Let me show you the minutes then, read you the  
18 minutes. Excuse me, the deposition, September 23, page 125,  
19 line 3: "Again you signed these 85 minutes as secretary, and  
20 you weren't secretary --" and then you cut me off, "I was  
21 acting secretary for Translator." Question: "And that was a  
22 self-imposed title again?" And your answer was, "Yes." Going  
23 on. I wanted to ask you about your practice in preparing  
24 minutes for the, the officers -- the minutes of the annual  
25 meetings of the combined boards of directors. Were they --

1 the minutes were prepared by you, correct?

2 A That's correct.

3 Q Okay, were they circulated to the officers and  
4 directors of NMTV before they were signed by you?

5 A The would have been circulated through the offices  
6 of Trinity Christian Center to -- I'm sure that Jane would  
7 have received a copy, and Paul Crouch would have received a  
8 copy, and I was aware that periodically Colby May would have  
9 received a copy. I'm not sure of whatever other officers  
10 examined it.

11 Q Or directors.

12 A Or directors.

13 Q For example, it wasn't your practice to send a copy  
14 to David Espinoza during the several years that he was a  
15 director and an officer of NMTV when the combined meeting --

16 A No, I didn't.

17 Q So you have no knowledge as to whether Mr. Espinoza  
18 saw those minutes before you signed them.

19 A No, he would have seen them at the next annual  
20 meeting. If not before.

21 Q But you don't know that he saw --

22 A I don't know if he did.

23 Q I'd like to ask you to direct your attention to Mass  
24 Media Bureau Exhibit 125.

25 MR. TOPEL: Volume 3.

1 BY MR. COHEN:

2 Q Tell me when you've found that.

3 A I found it.

4 Q Just spend a minute and spend enough time just to  
5 familiarize yourself.

6 A I'm familiar with it.

7 Q You drafted that document, am I correct?

8 A Yes, I did.

9 Q And how did it come about that you drafted that  
10 document?

11 A I would have been contacted by Jane Duff.

12 Q And do you have a recollection of her contacting  
13 you?

14 A Yes, I do.

15 Q And do you have a recollection of, of her asking you  
16 to prepare it?

17 A Yes.

18 Q And do you have a recollection of what she said to  
19 you?

20 A I -- as I sit here, I just recall that the informa-  
21 tion for it would have come from Jane Duff, and both as to the  
22 second, the first and the second paragraph. The third  
23 paragraph, I think, was information that Colby May had sug-  
24 gested through Jane Duff.

25 Q Colby May had suggested that TBN act as an account-

1 | ing agent for Translator TV, Inc.?

2 |       A     I believe that's the case.

3 |       Q     And from whom did you learn that information?

4 |       A     Well, this would have come to me through Jane.

5 |       Q     And did she tell you what Colby May said to her  
6 | about this matter?

7 |       A     I think it was in the context that there needs to be  
8 | more of a formal relationship between Trinity Broadcasting  
9 | Network and Translator TV.

10 |       Q     Did she tell you why Mr. May believed there needed  
11 | to be a more formal relationship?

12 |       A     No.

13 |       Q     And you never asked?

14 |       A     Not that I can recall, no. I -- yeah, I don't  
15 | think --

16 |       Q     That was not a matter of, of, of interest or concern  
17 | to you in connection with being a -- you being a board member  
18 | of Trinity Christian and being Trinity's counsel?

19 |       A     I generally assumed that it was for FCC purposes if  
20 | Mr. May was requesting it.

21 |       Q     Did you ever speak to Mr. May about this matter?

22 |       A     No.

23 |             (Pause.)

24 |       BY MR. COHEN:

25 |       Q     David Espinoza did not sign page 1 of these minutes,

1 and to be fair with you, you know there's two, two pages to  
2 this exhibit?

3 A Yes.

4 Q Yes.

5 A I'm well aware of that.

6 Q You're well -- I know you're well of it. Okay.

7 Okay, and am I correct that to your knowledge that  
8 Mr. Espinoza did not sign these minutes until quite recently?

9 A It would have been in preparation for this case.

10 (Pause.)

11 BY MR. COHEN:

12 Q Do you have personal knowledge that the, the docu-  
13 ment that we're referring to was submitted to Mr. Espinoza  
14 back in 1987?

15 A I have no personal knowledge.

16 Q Now, there came a time that you prepared the docu-  
17 ments looking toward changing the name of the corporation, am  
18 I correct?

19 A That's correct.

20 Q And I have reference to Mass Media Bureau  
21 Exhibit 128. Would you, would you direct your attention to  
22 that document?

23 A Yes, I have it.

24 Q Yes, and you've told Jane Duff how to prepare that,  
25 that --

1           A     I believe I --  
2           Q     -- minute, am I correct?  
3           A     I believe I gave her a form.  
4           Q     And tell, tell me, for the record, what your role  
5 was in the name change?  
6           A     I was contacted by Jane Duff and given a series of  
7 three names as possible names, new names, for Translator TV,  
8 Inc. Then I contacted the secretary of state, and found out  
9 that the, the name that was available was National Minority  
10 TV, Inc.  
11          Q     Okay --  
12          A     It was --  
13          Q     To whom did you provide that information?  
14          A     That it was available?  
15          Q     Yes.  
16          A     It would have been provided to Jane Duff.  
17          Q     And then what happened next?  
18          A     Jane indicated to me that National Minority TV, Inc.  
19 would be the name of the corporation and I prepared minutes of  
20 a -- of the special meeting and prepared a Certificate of, of  
21 Amendment.  
22          Q     Would that be Exhibit 30, Bureau Exhibit 30?  
23          A     Exhibit 130?  
24          Q     Yes, 130, excuse me.  
25          A     Yes, that is 130. The exhibit has matters on it

1 that I, I had not -- that were not part of my form, however.

2 Q But you prepared the Certificate of Amendment.

3 A Yes.

4 Q But there's some material on there that you didn't  
5 prepare?

6 A That I -- that was added after I'd sent it.

7 Q And what -- which material -- what material is that?

8 A The name of the secretary, that would have been  
9 added after I'd sent it over to, to Jane. There was a blank  
10 left on the form for the addition of the name of the secre-  
11 tary.

12 JUDGE CHACHKIN: But other than the name change,  
13 there was no change made in the substance of the article of  
14 incorporation as to the purpose of the corporation, was there?

15 MR. JUGGERT: That's true, there was no change at  
16 that time.

17 JUDGE CHACHKIN: Or at any other time.

18 MR. JUGGERT: At any -- or at any other time.

19 (Pause.)

20 BY MR. COHEN:

21 Q Please direct your attention to Bureau Exhibit 145.  
22 Now, you prepared that document, am I correct?

23 A 145? Yes.

24 Q Now, explain why you prepared that document.

25 A This was the indemnity provision we talked about

1 earlier in my testimony that had been incorporated in  
2 California law, and this is a document I sent out to approxi-  
3 mately 50 nonprofit corporations recommending that they put it  
4 in their, their minutes or their bylaws.

5 Q And Trinity has a similar provision, is that cor-  
6 rect?

7 A Trinity has a similar provision, yes.

8 Q Do you have knowledge as to whether any California  
9 lawyer has provided legal services to NMTV other than your-  
10 self?

11 A I can't think of any other, any California lawyer,  
12 no.

13 Q And I want to ask you the same question when the  
14 corporation was named TTI.

15 A The same answer.

16 Q Thank you.

17 A None to my knowledge.

18 Q Would you please turn to Bureau Exhibit 147? You  
19 were present at that meeting, were you not?

20 A Yes, I was.

21 Q Okay, and you, you drafted these minutes, am I  
22 correct?

23 A Yes.

24 Q Isn't it true that the failure to reflect your  
25 presence was an oversight?



1       A     I would say that it was, that it was, it was more,  
2 more of a, a matter of my general custom when I don't partici-  
3 pate in a meeting.

4       Q     Well, I want to --

5       A     I realize I said oversight at my deposition.

6       Q     Yeah, well, I want the deposition to reflect that on  
7 page 150, line 1, when I asked you, "And why is it not  
8 reflected in the minutes that you were present," your answer  
9 was, "Just an oversight. In fact, there isn't any listing of  
10 those present at all." I'd like to ask you about Exhibit 163,  
11 Bureau Exhibit 163.

12       A     Action by Written Consent?

13       Q     Yes, sir. You prepared that minute, am I correct?

14       A     I'm not so sure that it was typed by my office. I  
15 would have prepared the wording.

16       Q     The wording of the minute?

17       A     Right. Action by Written Consent.

18       Q     And the information set forth therein, who supplied  
19 it to you?

20       A     Jane.

21       Q     Jane, Jane Duff --

22       A     Jane Duff, yes, excuse me.

23       Q     I want to ask you about Bureau Exhibit 170.

24       A     Yes.

25       Q     Yes, and you prepared that minute, didn't you, that

1 special meeting?

2 A Yes.

3 Q And you were present at that meeting then?

4 A I was present at that meeting.

5 Q Thank you. Tell me who was present at that meeting,  
6 if you can recall, and by "that meeting" I'm referring to the  
7 meeting held on November 20, 1987.

8 A It would have been Paul Crouch, and Jane Duff, and  
9 myself. Let me see what the context of it was. I -- this  
10 minute, I'm not sure if anybody else was present.

11 Q How about Terry Hickey?

12 A Terry Hickey may have been present because this  
13 involved the finances.

14 Q Can, can you tell me what the, if you know, what the  
15 criteria was, if you will, as to whether Terry Hickey would be  
16 present at an NMTV meeting?

17 A I don't know if there was any, any set type criteria  
18 other than Terry was generally there if there were some --  
19 going to be some financial involvement on the part of Trinity  
20 Christian Center to be of assistance to National Minority.

21 Q Will you turn to 176, if you would? Bureau 176.

22 A I have it.

23 Q Now, you prepared those minutes, didn't you?

24 A Yes, I did.

25 Q And you were present at that meeting, am I correct?

1           A     Yes, I was.

2           Q     Okay.  Would you next turn to Exhibit 231 and, of  
3 course, it's Mr. Topel's job to tell you about the volumes on  
4 these, not mine.

5           A     My guess is 4.

6                 MR. TOPEL:  What exhibit number?

7                 MR. COHEN:  231.  Because I don't want to interfere  
8 with his responsibility.

9                 JUDGE CHACHKIN:  I think the witness has probably  
10 mastered the technique by now.

11                MR. TOPEL:  Now I have to find it.

12                (Pause.)

13                BY MR. COHEN:

14           Q     Do you have that document?

15           A     Yes.  Yes.

16           Q     The minutes of December 14, 1988.  Did you prepare  
17 those?

18           A     Yes, I, I did.

19           Q     And you were present at that meeting, weren't you?

20           A     I'm not sure about that.

21           Q     Well, let me refer you to your deposition on  
22 Thursday, September 23, page 156, line 3:  "These minutes were  
23 signed by Jane Duff.  Did you, did you prepare them?"  Answer:  
24 "Yes, I would have prepared these."  Question:  "Were you  
25 present at the meeting?"  And the answer was, "Yes."

1           A     Um-hum. I assume that's correct, then.

2           Q     I want to ask you about Mass Media Bureau  
3 Exhibit 267, if they keep it in this volume.

4           A     What number was that?

5           Q     267.

6                     (Asides.)

7                     BY MR. COHEN:

8           Q     You never thought you were going to have to work so  
9 hard as a witness, did you, Mr. Juggert?

10          A     Need to lose the weight.

11                     JUDGE CHACHKIN: Also, there's no Workmen's  
12 Compensation that you can --

13                     BY MR. COHEN:

14          Q     You -- you're, you're forewarned, Mr. Juggert, that  
15 in doing this you've assumed the risk, as the judge is telling  
16 us.

17          A     No government tort liability.

18          Q     You assume the risk here.

19          A     Yes.

20          Q     All witnesses testify at their own peril when it  
21 comes to picking up these documents. The rule of the case. I  
22 wanted to ask you about the, the document dated June 22nd,  
23 1989, which, is, is a letter to, to Mr. Espinoza signed by  
24 Jane Duff, and then accompanying it -- it accompanies an  
25 Action by Written Consent. The question I have for you is,

1 did you prepare the Action by Written Consent?

2 A Yes.

3 Q Now, I want to ask you a more general question.

4 We've been going through the minutes of NMTV and its prede-  
5 cessor company. Am I correct that you are the -- your office  
6 is the repository of the official -- the minute book of the,  
7 of the companies in your office?

8 A Yes, they are.

9 Q And you are the -- you are in charge of that minute  
10 book?

11 A Well, I guard it.

12 Q You guard it. Would you look at Exhibit 293? Now,  
13 this is an annual meeting of NMTV dated January 15, 1990. Did  
14 you prepare those minutes?

15 A Yes, I did.

16 Q Now, tell me, were you present at that meeting?

17 A Best of my recollection, I was.

18 Q In your deposition --

19 A It's either not present at '90 or '91, which --

20 Q At September 23, 1993, I asked you on page 162 --  
21 page 161, line 22, "And were you present at that meeting,  
22 referring to the meeting of January 15, 1990?" And your  
23 answer was I don't believe I was. Do you now have a, a more  
24 current recollection than --

25 A No, I think that's correct. I don't think I was at

1 that meeting.

2 Q Then who was your source of information?

3 A I believe that Jane, Jane Duff, would have prepared  
4 tentative minutes of the meeting, and then provided them to  
5 me, and I would have worked with her in coming up with a final  
6 document.

7 Q Was that the course of action, the course of proce-  
8 dure, rather, that you normally followed with Mrs. Duff when  
9 you were not present at a meeting?

10 A Yes.

11 Q She would, she would prepare the, the minutes in  
12 draft form, submit it to you for your review?

13 A Generally, that was the case.

14 Q Would you please turn to Mass Media Bureau  
15 Exhibit 300? And this was a special meeting held on April 19,  
16 1990, do you see that?

17 A Yes.

18 Q Okay, were you -- first of all, did you prepare  
19 these minutes?

20 A I did prepare them.

21 Q And were you present at that meeting?

22 A I don't believe I was.

23 Q And tell me the basis upon which you prepared the  
24 minutes.

25 A I would have been contacted by Jane Duff and

1 | informed of the actions that had been taken either in writing  
2 | or orally, and would have prepared the minutes. I believe  
3 | that these were just on the basis of notes that Jane took at  
4 | the meeting.

5 |       Q     I want you to look at Exhibit 294.

6 |       A     I have it.

7 |       Q     No, I have the wrong, the wrong exhibit number.

8 | Excuse me a second, Mr. Juggert, I'm sorry. Exhibit 315 is  
9 | where I should be directing you. Did you prepare these min-  
10 | utes?

11 |       A     Yes.

12 |       Q     This is the meeting of June 19th?

13 |       A     Um-hum, yes.

14 |       Q     And were you present at that meeting?

15 |       A     Yes.

16 |       Q     Would you look at Bureau Exhibit 318? Those are the  
17 | minutes of August 15, 1990?

18 |       A     Yes.

19 |       Q     Did you prepare those minutes?

20 |       A     Yes, I did.

21 |       Q     Were you present at that meeting?

22 |       A     I was.

23 |       Q     Now, this meeting reports the election of  
24 | Philip Aguilar to the board of directors as a replacement for  
25 | the retiring David Espinoza. Do you see that?

1 A Yes.

2 Q Now, you knew Philip Aguilar before he was elected  
3 to the board, didn't you?

4 A Yes, I did.

5 Q And you had helped him to obtain a tax exemption for  
6 his church, Set Free, hadn't you?

7 A That's correct.

8 Q And you hadn't billed him for that, had you?

9 A No, I didn't.

10 Q And your, your partner has provided other services  
11 to Set Free, and to members of Set Free, am I correct?

12 A Partner has provided services, yes, for -- in the  
13 sense of writing letters for them.

14 Q And, and those persons on whose behalf the letters  
15 were written were never billed for those services.

16 A That was all pro bono.

17 JUDGE CHACHKIN: To turn to another exhibit, we'll  
18 take a recess until 1:30.

19 MR. TOPEL: Thank you, Your Honor.

20 (Whereupon, a brief recess was taken for lunch from  
21 12:30 p.m. until 1:35 p.m.)

22

23

24

25



1                   A F T E R N O O N   S E S S I O N

2                   JUDGE CHACHKIN: Proceed, Mr. Cohen.

3                   MR. COHEN: Thank you, Your Honor.

4                   BY MR. COHEN:

5           Q     Mr. Juggert, when we went for our, our luncheon  
6 recess, I was about to ask you a question concerning Mass  
7 Media Bureau Exhibit 328, and I'd be grateful if you'd look at  
8 that. It should be in --

9                   MR. TOPEL: Volume 6.

10                  BY MR. COHEN:

11           Q     Yes, I didn't want to preempt Mr. Topel. Why did I  
12 say two? 338, excuse me. I'm in error. And spend a minute  
13 and, and please look those minutes over. That's the  
14 January 21, 1999 [sic] annual meeting.

15           A     Yes.

16           Q     And please tell me when you've looked them over.

17           A     I've looked it over.

18           Q     Did you prepare those minutes, sir?

19           A     Yes.

20           Q     And were you at that meeting?

21           A     Testimony -- testified at my deposition I wasn't but  
22 in reviewing these, I've concluded I was.

23           Q     Thank you. What made you -- what, what refreshed  
24 your recollection or what made you decide that you were at the  
25 meeting?

1           A     Two things, the reference to the film "China Cry"  
2 and the reference to Wilmington, Delaware.

3           Q     Very good. Would you look at Exhibit 348? And  
4 those are the minutes of a special meeting held on April 5,  
5 1991. Please look them over and tell me when you've, when  
6 you've looked at them.

7           A     Yes.

8           Q     Did you prepare those minutes?

9           A     Yes.

10          Q     And were you present at that meeting?

11          A     Yes.

12          Q     Would you look at Exhibit 358? This was a meeting  
13 held on June 27, 1999 -- 1991, a special meeting of NMTV. Did  
14 you prepare those minutes? First, please take a minute and  
15 review them, and there's two pages. In each instance I want  
16 you to always review the minutes before you answer the  
17 question.

18          A     Yes.

19          Q     You did prepare those minutes?

20          A     Yes.

21          Q     And were you present at that meeting?

22          A     Yes.

23          Q     Would you please refer to, to Bureau Exhibit 377 and  
24 please review those minutes? And tell me when you've done it.

25          A     I'm ready.

1 Q Did you prepare those minutes, sir?

2 A Yes.

3 Q Now, I want to ask you a question about the, the  
4 time when Pastor Hill, Reverend Hill, became a board member.  
5 Do you recall whether your views were solicited about the  
6 desirability of, of bringing him onto the board?

7 A I don't know if they were solicited. I don't  
8 believe they were solicited. I was just informed that that  
9 was being proposed.

10 Q By whom?

11 A I believe it was Dr. Crouch.

12 Q And what was the, the context in which he informed  
13 you?

14 A As I recall, it was simply that Dr. Hill was being  
15 considered for the position of a board member of National  
16 Minority, and I was very enthused about the possibility.

17 Q And did anyone else talk to you about Dr. Hill  
18 joining the board?

19 A Not that I can recall as I sit here.

20 Q Mrs. Duff didn't talk to you about that?

21 A She may have. I just -- I don't have no current  
22 recollection.

23 Q Do you remember that there came a time, and this was  
24 prior to the time that Dr. Hill became a board member, but  
25 there came a time when Pastor Aguilar became a director?

1 A Yes.

2 Q And were your -- were you -- did anybody talk with  
3 you about that event before it occurred?

4 A I believe Reverend Crouch mentioned it to me.

5 Q And what, and what did he say to you?

6 A Just that he -- that Phil Aguilar was being consid-  
7 ered as a potential board member for National Minority TV. As  
8 I recall, it came after the resignation of Mr. Espinoza.

9 Q Did, did Mrs. Duff discuss Pastor Aguilar's forth-  
10 coming selection with you?

11 A I don't recall that.

12 Q Would you look at Exhibit 382?

13 A My request for --

14 Q Let me, let me find it if I could. I may, I may  
15 have an error here. That's an error on my part. Let me find  
16 the right number. Excuse me 1 second.

17 (Pause.)

18 MR. COHEN: Can we go off the record, Your Honor?  
19 Because I'm having trouble finding a document. Can I ask  
20 this --

21 JUDGE CHACHKIN: All right, we'll go off the record.

22 (Whereupon, a brief recess was taken.)

23 MR. COHEN: Thank you very much. Yes, that's it.

24 Thank you very much.

25 BY MR. COHEN:

1 Q Mr. Juggert, I -- would you refer to page 5 of  
2 Bureau Exhibit 382?

3 A I have it in front of me.

4 Q Okay, and did you prepare that document?

5 A Yes.

6 Q Please refer to Bureau Exhibit 386 and take a minute  
7 and read that, if you would.

8 A This is the 1982 annual meeting?

9 Q This is the 1992 annual meeting?

10 A '92, right. I need my glasses.

11 Q Yeah, take a minute.

12 (Pause.)

13 MR. JUGGERT: Yes, I've read it.

14 BY MR. COHEN:

15 Q Yes, and were you -- did you prepare that document?

16 A Yes.

17 Q And you were present at that meeting?

18 A Yes.

19 Q Thank you. Now, I know I asked you about this this  
20 morning but I've -- I want to revisit it in a different way.  
21 I asked you this morning about whether you were aware of a  
22 1993 annual meeting and you said you were not. Do you recall  
23 your testimony?

24 A That's correct.

25 Q Okay, and in looking at the, at the minutes of the

1 1992 annual meeting and reviewing the previous years, it, it  
2 certainly seems to me that it was the regular practice and  
3 normal practice of NMTV to hold yearly annual meetings, would,  
4 would you agree with that?

5 A I would agree with that.

6 Q And if you look at, at the minutes as I've done in  
7 the lunch hour, it's clear that in each year the officers and  
8 directors were elected and/or re-elected, you'd agree with  
9 that?

10 A Yes.

11 Q And the minutes also reflect each -- in each annual  
12 meeting that the financial reports, for example, are, are  
13 usually noted.

14 A That's correct.

15 Q Do you agree with that?

16 A Yes.

17 Q Okay. Given that pattern of, of, of conduct, I'm,  
18 I'm completely at a loss to, to try to understand why NMTV  
19 would vary its practice and not have an annual meeting in  
20 1993. Can you help us in any way?

21 A I can't.

22 Q And is this the first time that you've given any  
23 consideration to the, the matters that I've just asked you  
24 about?

25 A I talked to my counsel, Mr. Topel, about it.

1 Q I mean, prior, prior to the -- and you talked with  
2 Mr. Topel just very recently.

3 A Yes.

4 Q But --

5 A But, no, not prior to that.

6 Q Then you never had occasion to talk with Mrs. Duff  
7 about --

8 A No.

9 Q -- this matter?

10 A Not that I can recall.

11 Q And you never raised it with her?

12 A No.

13 Q Were you aware that in, that a 1993 annual meeting  
14 hadn't been held?

15 A No.

16 Q Well, you -- your office is the, the repository of  
17 the, the minute book, am I correct?

18 MR. TOPEL: Your Honor, I'm, I'm going to object.  
19 We covered the, the questions almost --

20 JUDGE CHACHKIN: Well, let's see where he's going.

21 MR. TOPEL: -- verbatim from this morning --

22 JUDGE CHACHKIN: Well, I'll --

23 MR. TOPEL: -- and I think that last question, the  
24 intonation suggests some argumentation with the witness. He,  
25 he's been very consistent.

1 JUDGE CHACHKIN: I'll overrule the objection. Go  
2 ahead, Mr. Cohen.

3 MR. COHEN: It's not my intent to argue with --

4 JUDGE CHACHKIN: Just go ahead, Mr. Cohen, with your  
5 questioning.

6 BY MR. COHEN:

7 Q You, you keep the minute book, is that correct?

8 A That's right.

9 Q Do you review it from time to time?

10 A No, I -- unless I'm called upon to do that for some  
11 specific reason.

12 Q Thank you.

13 JUDGE CHACHKIN: Do you have any responsibility for  
14 advising the members, Mrs. Duff in particular, that it's time  
15 for another annual meeting?

16 MR. JUGGERT: Only voluntary. No, no legal  
17 responsibility.

18 JUDGE CHACHKIN: But have you done that on a volun-  
19 tary basis from year to year?

20 MR. JUGGERT: No, because it's, it's been a matter  
21 of course. It's always in January.

22 JUDGE CHACHKIN: So you were aware -- well, then you  
23 were aware in January, were you not, that no meeting had  
24 been -- I'm talking about January 1993. Weren't you aware of  
25 the fact that no meeting had been held that month?



1 MR. JUGGERT: I didn't know if one had been held or  
2 not. These minutes usually -- these meetings usually take the  
3 course of, oh, 3, 3 to 5 days, and I was just at this meeting  
4 on the, the very first, first morning. I would have --

5 JUDGE CHACHKIN: Which meeting are you talking  
6 about?

7 MR. JUGGERT: Well -- when there was -- the, the  
8 meetings of National Minority have generally occurred  
9 sometimes in January, and they have generally occurred when  
10 there's been a, a combined board meeting of the various  
11 corporations related to, to Trinity, and during the, the, the  
12 last board meeting that was held in 1993, I was there just for  
13 the combined board meeting of the Trinity corporations. The  
14 National Minority board meeting would have been held  
15 separately and I wasn't around to see if it was, if it was  
16 held or not.

17 JUDGE CHACHKIN: But, but as I gather from questions  
18 by Mr. Cohen, you have been present at the annual meetings of  
19 NMTV.

20 MR. JUGGERT: That's, that's correct.

21 JUDGE CHACHKIN: And nobody at that time asked you  
22 during the combined meeting of the fact that there was going  
23 to be a separate meeting of National Minority and that "we  
24 need you to act as secretary in some capacity --

25 MR. JUGGERT: No, that was --